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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SARAH EDMONDSON, *et al.*)
)
Plaintiffs,)
) Civil Action NO. 20-CV-485
v.)
)
Keith Raniere, *et al.*)
)
Defendants.)
)

**REPLY MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT NICKI CLYNE'S
MOTION TO DISMISS THE FIRST AMENDED COMPLAINT**

I, Nicki Clyne, respectfully submit my Response to the Plaintiffs' Response in Opposition to Certain Defendants' Motions to Dismiss the First Amended Complaint.

1. In his "Response," Mr. Glazer failed to address valid concerns raised in Defendants' Motions to Dismiss. Instead, he expanded the scope of his response by adding additional fictitious claims.

2. Mr. Glazer starts in the first sentence of his creatively titled “Statement of Facts” that the five Defendants’ motion to dismiss the FAC argues “variations on a theme: each had little to do with the others and harms visited on Plaintiffs.”
3. Yet he is the one who lumped every Plaintiff suing every Defendant for everything in his incomprehensibly muddled original themed Complaint and his First and Second Amended variations on his theme. All three themes are vaguely orchestrated and rife with discordant conclusory allegations that presuppose harm to the Plaintiffs, are unsupported through argument or evidence, and are decidedly off-key.
4. One would logically assume that, with the number of individuals represented by Mr. Glazer, some of whom were high-ranking members of NXIVM, he had access to facts and evidence to support his claims, yet he demonstrates little to none.
5. Instead, he offers non-sequiturs and weaves together a fanciful story that has no place in a court of law, lacks due process, and resides in a realm where truthiness supplants truthfulness as if this Court held the same standards as the most passionate of the populist media or a Lifetime TV movie.
6. Aside from the lack of factual basis for the accusations, I stand perplexed as to why I am a Defendant in the first place.
7. As I mentioned in my Motion to Dismiss, I have no assets except for one 2011 Subaru.
8. It is evident Mr. Glazer is not seeking damages but to include me in his attempt to tie apron strings to everything in the kitchen and to the only Defendants he cares about: Clare and Sara Bronfman, whose fortunes he vainly believes he can siphon for himself at 33.33% of whatever he can collect.

9. For an attorney who presented himself as “pro bono” at the beginning of the case, the road to being a millionaire is a path set with deception, or at least very taught strings.
10. I know of individuals who were contacted by Sarah Edmondson as early as March 2018 and invited into the lawsuit by intimidation, telling them they could be in trouble if they did not join – as if safety was assured by shouting with the mob – and then, to seal their recruitment, telling them she has a pro bono lawyer for them, so, no worries. This lawyer was Neil Glazer. There is a difference between pro-bono and working on spec at 33.333333 percent.
11. Another way people were invited into the “you’ll-only-be-safe-from-prosecution-if-you-sue” lawsuit was by being referred to a “therapist,” whose credentials are “dubious,” if the use of that word can be seen as being politely generous. This therapist encouraged a perspective of victimhood that was replete with all the mercenary advantages of the crocodilian tear. The person was introduced to a plan contrived to encourage free therapy and then be therapeutically persuaded that the healing balm is green and quick and easy. Best of all, it would be anonymous.
12. I have evidence and witnesses to support these blatant statements of a larcenous attorney using whatsoever means to induct, induce, recruit, enroll, and, pardon the word, “brainwash” people who were otherwise adults into simpering, whimpering, willowy shells of themselves – under therapy, tearfully rewriting their history with NXIVM into accounts that conformed with Mr. Glazer’s theories of liability. They became terrified, traumatized, and never-to-be-healed victims when just a few days before they were beautiful and happy beings. They remind me of the lame man who suddenly goes out dancing as soon as the insurance adjuster approves his claim.

13. The individuals invited to the lawsuit were persuaded with anonymity, complimentary therapy, pro bono legal protection from criminal prosecution, and a payday based on the more fantastic the victimhood, the more significant the payday. Acting lessons provided if needed¹.
14. As for my own seemingly easy-to-change role from the Defendant to the Plaintiff, it is all too apparent that all I have to do is “change my mind.” Instead of taking adult responsibility for my choices, I can choose to indulge in banal infantility and blame others for my own decisions. This will work, I suspect, up until there are but three Defendants, Mr. Raniere and the two Bröhnmans. Although I suppose Mr. Glazer might dispense with Mr. Raniere as a Defendant.
15. I find it odd and, to a degree, laughable – though being in a lawsuit is no laughing matter unless you are laughing all the way to the bank – that the two people responsible for my involvement in NXIVM are Lead Plaintiffs. If this doesn’t evidence that I am on the wrong side of this because I won’t comply with the Glazer narrative, I do not know what will prove it.
16. One of the lead Plaintiffs, Mark Vicente, for example, was co-owner of two NXIVM centers; he taught trainings, mentored coaches, grew the businesses, selling precisely what he claims hurt him severely to all and sundry.
17. If NXVM was a harmful drug, he was one of the chief peddlers.

¹ I do not give credence to the story asserted upon information and belief that victims were coached in how to cry by being told if the tears did not come naturally to pluck a hair from their nose. I note for the record that some of the Plaintiffs seemed to have exceedingly bald noses.

18. A dealer in NXIVM, who dealt it to many, including me, the woman he claims made him a victim. He was a victim from whom he reversed the traditional roles, for he profited off of me.
19. While I don't have the exact numbers of how much he profited over 12 years of endless, relentless pitching and selling to one and all, including me, that NXIVM was the greatest pabulum known to modern humanity, I know I would pull up to classes he taught in my little old Honda (my car then) as he got out of his brand-new BMW.
20. And he is my victim. Fancy that.
21. Another Lead Plaintiff, Sarah Edmondson, with whom I was friends in Vancouver, where I used to live and trusted her with having such an honest intent that I said yes when she invited me to this "amazing personal growth program in Upstate New York." Meanwhile, she profited handsomely financially from every class I took and was promoted based on my efforts and enrollments in her downline. Ms. Edmondson promised me the program would help me improve my relationship with my father, my acting career, and romance.
22. I promised her nothing about NXIVM except I would pay her. She promised me the moon and stars and all things fabulous, as long as I paid for what she now calls this terrible thing. When did she learn it was bad? When came the epiphany? When did she become my victim? Was it AG or BG – before or after Glazer?
23. Despite Ms. Edmondson claiming what she sold me was based on a "pseudoscientific hodgepodge of psychotherapeutic methods which, when practiced by unlicensed and unqualified lay-people, subjected its participants to an unreasonable risk of serious psychological injury and emotional distress," she was the unqualified lay-person who taught it to me.

24. All kidding aside, NXIVM helped me tremendously, and I am grateful to my poor “victim,” Ms. Edmondson, for victimizing me by introducing me to NXIVM, which is why I am a Defendant because I am grateful instead of a weepy victim.

25. I am not grateful, however, for Ms. Edmondson’s alleging things she knows are inaccurate, for if they were true, it would make her responsible, and I would have to sue her.

26. This lawsuit looks to “make people whole” by holding those responsible “accountable” and awarding damages. Ms. Edmondson should, if she prevails, be prepared to pay me everything she wins as a refund for all the money I spent over 12 years. She constantly cajoled and talked me into taking more classes, and if we believe her claims in the lawsuit, she brainwashed me with her assortment of sales techniques and unqualified lay teachings. When will she repair the harm she caused me? If her claim about NXIVM is valid, that is.

27. If it is true, my damages are worse than hers because I have been so brainwashed that I can’t recognize the years of abuse I endured from Ms. Edmondson and Mr. Vicente, two of the prominent leaders of NXIVM.

28. According to Ms. Edmondson, I am in denial; that’s what she says publicly on her podcast, *A Little Bit Culty*.

29. So, who should be held accountable for my denial, for Edmondson’s efforts to extract money from me because, according to Mr. Glazer, the “purpose was to induce people to pay money for NXIVM and please Raniere, the leader, by various means including criminal and tortious acts to psychologically manipulate and coerce NXIVM members into submission, and systematically break down their resistance to escalating abuse and control—all to extract money and free labor, including sex, from their victims”?

30. Sarah Edmondson and Mark Vicente were the ones who brainwashed me, so should they not be held accountable for this monumental deception? I trusted them. I looked up to them. I believed what they said about Keith Raniere and NXIVM.
31. Now they have an epiphany and can wash away the hundreds of people they inveigled to join, just as Mr. Glazer inveigles plaintiffs to join his lawsuit.
32. Yet this lawsuit fails to distinguish between what constitutes being a “victim” vs. being a Defendant.
33. It is evident that the Bronfmans’ fortune is the primary deciding factor of victimization. Anyone who has not (yet) comported to their narrative that they are a “victim” is a Defendant. Simple as that.
34. Mr. Glazer says he cares for the well-being of victims, provided they know they are victims and will lend them their names.
35. I was never a leader of an “enterprise;” there was no “enterprise.”
36. NXIVM was never alleged to be a criminal enterprise in the criminal trial and I was never indicted.
37. NXIVM was a community of people engaged in various activities, companies, and shared values of personal improvement and of wanting to make the world a better place.
38. The singling out of certain people as Defendants when the company had many leaders and participants across several different countries exposes the nature of the accusations to punish people who don’t support the Glazer narrative and help him extract millions of dollars from the Bronfmans.
39. There is no other explanation; otherwise, several of the Plaintiffs should be Defendants and dozens of others not included in this complaint.

40. Most especially, lead Plaintiffs Mark Vicente and Sarah Edmondson were responsible for my introduction and continued participation in NXIVM.
41. In addition, Mr. Glazer used this legal vehicle to make false accusations that are irrelevant to the accusations made in the FAC and SAC.
42. Mr. Glazer has named me the head of companies I NEVER participated in, let alone led, and fabricated companies and intentions to suit his fantastic narrative.
43. I implore Mr. Glazer to provide evidence for his fantastical claims, including my receiving money or free labor, including sex from ANY of the Plaintiffs, or promoting Mr. Raniere as “a genius, great humanitarian whose stellar achievements started when he was a child prodigy, a scientist who invented dozens of patented technologies, and a celibate ascetic with no material worldly desires, whose generosity knew no bounds.”
44. I never claimed any of the above.
45. On page 7, Mr. Glazer references a company called “TEN C.”
46. TEN C was a concept to offer discounts to college students by harnessing bulk buying power, so they could save money on supplies and commonly purchased items and create a network and community that promoted humanity and expression through events and concerts.
47. The company never got off the ground save for sponsoring a single small event in Troy, NY.
48. I was involved in this effort, as were seven other individuals, yet only three are named in the complaint, suspiciously.
49. Mr. Glazer is either entirely in the dark about his Plaintiffs participation in TEN C or being curiously careful to omit facts.
50. Sarah Edmondson was also a leader of TEN C.

51. The event we hosted — which involved renting a space, making fliers, decorating the space, hiring a DJ, etc. — was one that she co-organized.
52. Ms. Edmondson was involved with every step of the preparation and planning, and I have all emails to prove it.
53. If I am guilty of what I supposedly did for TEN C, then Ms. Edmondson is more culpable, for she was of a higher rank than me in NXIVM.
54. TEN C was allegedly designed to “lure young college-age women into a sexual relationship with Mr. Raniere through offers of work opportunities in Defendant Clare Bronfman’s t-shirt company.”¹
55. If this is true, then shame on Sarah Edmondson.
56. But it is not valid. Mr. Glazer cannot name a single woman lured into a sexual relationship with Mr. Raniere because of Ms. Edmondson’s leadership of TEN C and my participation.
57. I am also not aware of any t-shirt company owned by Ms. Bronfman, nor did I ever introduce myself or Mr. Raniere to any college-aged women. I cannot speak for Ms. Edmondson or Mr. Vicente, however.
58. The claim that I “later worked with Raniere and Mack to run two other companies, the Source and the Knife, which spawned more NXIVM curricula and recruited new people to join NXIVM” is also exciting fiction.
59. I never participated in The Source, even as a student, let alone running the company.
60. However, Plaintiffs Mark Vicente, Bonnie Piesse, Sarah Edmondson, and Maja Miljkovic were leaders in The Source.
61. This is another case where the Plaintiffs make themselves victims by creating false narratives and tears.

62. Mr. Glazer is promising people a payday, and hope is always refreshing until it fails to materialize.

63. But you can't blame a guy for trying, only I hope he does not try so hard that he becomes a witness in the case.

64. I know the tears are pouring like rain in Vancouver during the rainy season, and like the leaves, hair is turning color. Why I never saw a Plaintiff so completely altered, upon information and belief, Sarah Edmondson's hair has turned quite gold from grief.

65. I petition this court to throw out this rancid, dishonest, disingenuous, frivolous, false behemoth in its capacity to mislead utter fictional lawsuit and insert Ms. Edmondson and Mr. Vicente in place of my name as Defendants.

Thank you, Your Honor.

Date: April 11, 2022

Respectfully submitted,

/s/ Nicki Clyne